



*The Nation's Voice for People with Hearing Loss*

November 11, 2014

*via electronic filing*

Marlene H. Dortch  
Secretary, Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW, Room TW-A325  
Washington, DC 20554

Re: Notice of Oral *Ex Parte* Presentation  
WT Docket No. 07-250

Dear Ms. Dortch,

On November 6, 2014, Lise Hamlin of Hearing Loss Association of America (HLAA), Linda Kozma Spytek, co-director of the Rehabilitation Engineering Research Center on Technology for Deaf and Hard of Hearing at Gallaudet University, and Claude Stout of Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI), met with Michael Janson, Eli Johnson, and Chad Breckinridge of the Wireless Telecommunications Bureau and Karen Peltz Strauss, Robert Aldrich, Greg Hlibok and Elaine Gardner of the Consumer and Governmental Affairs Bureau.

Issues discussed:

- HLAA's 2014 survey of consumers who purchased mobile devices. The survey revealed that consumers continue to face problems finding hearing aid compatible phones, including consumers who reported difficulty finding HAC mobile devices and consumers who purchased mobile devices they thought were HAC, but experienced interference (buzzing) when the phone was held to their hearing instruments.
- We compared the 2014 survey to an earlier survey HLAA provided and filed with the FCC in 2012. We noted that:
  - People who responded overwhelmingly agreed that all or most phones should be hearing aid compatible
    - 2011: 78% thought 100% of cell phones should be HAC
    - 2014: 80% thought 100% of cell phones should be HAC
  - Fully one quarter of the people responding reported that they experience interference on the phone they currently own and use
    - 2011: 26% reported some interference; 73% had not experienced any interference or experienced it a few times

- 2014: 24% reported some interference: 76% had not experienced any interference or experienced it a few times
- Those who responded do not understand the HAC ratings: in fact, it appears that fewer people understand these ratings now (2014) compared to a few years ago (2011)
  - 2011: 58% are not sure, or do not understand the HAC ratings
  - 2014: 67% are not sure or do not understand the HAC ratings
- Most of those responding still get information about hearing aid compatible phones from the carrier's store personnel. If the store personnel have an understanding about HAC phones, they do well; if not, the consumer is lost
  - 2011: 40% receive information in the store
  - 2014: 36% receive information in the store
- Most people responding felt that in-store testing, "try before you buy:" was very important
  - 2011: 97% indicated that all stores that sell cell phones should provide for in-store testing
  - 2014: 97% indicated that all stores that sell cell phones should provide for in-store testing

We noted that websites of carriers and manufacturers have improved in their provision of HAC information, but that information appears to be infrequently updated, frustrating consumers and store personnel alike when it provides information about models no longer available and provides no HAC information about models in stores.

We discussed issues related to acoustic coupling and volume control on the phones, specifically:

- The TIA (Telecommunications Industry Association) standard for measurement of amplified telephones (i.e. phones that have the ability to amplify output significantly for people with hearing loss) includes a new acoustic test. That test accounts for the fact that people with hearing loss who use a hearing device typically cannot hold the phone's handset next to the microphone of their device in the same way a person without hearing loss can hold a handset to their ear. This test is simple to implement and closely simulates the handset holding style employed by users of hearing devices. We suggest the same type of acoustic test could be used for mobile devices.
- TIA also has met with the Commission regarding a new amplification metric called "conversational gain." We suggest once again that the same potential benefits of this new metric could be applied to mobile devices.

Our recommendations:

- People with hearing loss who use hearing aids and cochlear implants must have universal access to mobile phones. These phones should not rely on an external device, such as a Bluetooth receiver, a neckloop or other connective device that makes it difficult for the consumer to use the mobile phone in all situations the consumer needs to use that phone.
- Considering the continued problems with the availability of HAC phones, we recommend that hearing aid manufacturers, carriers and other stakeholders once again open a dialog with consumers to address the problems that consumers continue to face, as they did during the meetings of the ATIS working group.
- Considering fully 1/3 of those responding still report that they experience interference, there is some question as to whether the standard used for HAC ratings is measuring hearing aid compatibility accurately. We recommend a technical review of the standards.
- Considering consumers still report it is difficult to find phones that are compatible with their hearing aids, whatever standards are used to test phones, we recommended that the Commission re-evaluate current benchmarks for HAC mobile devices and increase the number of mobile devices required to be HAC in both the acoustic and telecoil mode.
- Until such time that 100% of phones are required to be HAC, more education is needed for consumers about the HAC ratings, what they mean and how to find a phone that works with their hearing aids.
- We recommend that carriers and manufacturers provide information about the currently available HAC models be maintained on a website that is frequently updated.
- Store personnel must be trained to know about HAC ratings and how to find which phones are HAC while that consumer is still in the store.
- Stores that sell mobile phones should always allow for in-store testing by consumers with hearing loss.
- Standards for volume control should be established for mobile phones.

Respectfully submitted,



Lise Hamlin  
Director of Public Policy



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cc: Michael Janson, WTB  
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